

1. Mark Whitburn, Whitburn & Pevsner, PLLC, 2000 E. Lamar Blvd., Suite 600, Arlington, Texas 76006. As counsel for Plaintiffs in this matter, Mr. Whitburn is anticipated to testify concerning reasonable fee rates for attorneys in this type of case in the applicable market.
2. Plaintiffs do not at this point designate experts concerning the issue of disability in this matter, as this Court has already made the requisite final determinations in connection with previous litigation. Plaintiffs also do not designate experts concerning any other issues finally determined by this Court in connection with previous litigation. If this Court deems it appropriate to revisit these issues, whether as a result of a determination by the United States Court of Appeals for the Fifth Circuit or otherwise, Plaintiffs seek leave to designate appropriate experts at that time.

3. In accordance with the Scheduling Order previously entered in this matter, Plaintiffs reserve the right to designate experts at a later date for the purpose of resisting claims asserted by Defendants in this matter.

Dated: October 5, 2020

Respectfully Submitted,

/s/ Mark Whitburn

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CERTIFICATE OF SERVICE

I certify that on this 5th day of October, 2020, a true and correct copy of the foregoing document was sent via electronic filing service to counsel for Defendant as follows:

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/s/Mark Whitburn
Mark Whitburn